

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ADAM J. VISNICK and HOWARD
VISNICK,

Plaintiffs,

v.

SANCTUARY 4298 INVESTMENTS
LLC,

Defendant.

CIVIL ACTION
NO. 04-10815 MLW

AFFIDAVIT OF ALICE ABRAMS

I, Alice Abrams, do hereby depose and state that the following is based on my personal knowledge and is true to the best of my memory and belief:

1. I reside at 647 Sanctuary Drive, Boca Raton, FL.
2. I am not currently employed, and I have been retired since 1988. I have never placed, negotiated or arranged for any mortgage since my retirement in 1988. I am not a mortgage broker. Moreover, I have never been licensed as a mortgage broker in MA, or any other state.
3. Sanctuary 4298 Investments LLC ("Sanctuary") was a company set up in 1997 by my husband, Robert ("Bob") Abrams, several years after we moved into our house at 4298 Sanctuary Lane in Boca Raton, FL, and around the time that we were moving into our home at 647 Sanctuary Drive. Sanctuary was established as a matter of convenience just to keep the title of our home separate from our other personal investments. Sanctuary was not established for the purpose of loaning money or extending credit. Sanctuary maintains a bank account in Florida. I

have no role in the operation of Sanctuary and my husband, Bob, has sole signatory authority over the Sanctuary bank account.

4. I have never advertised or solicited any mortgages on behalf of Sanctuary.

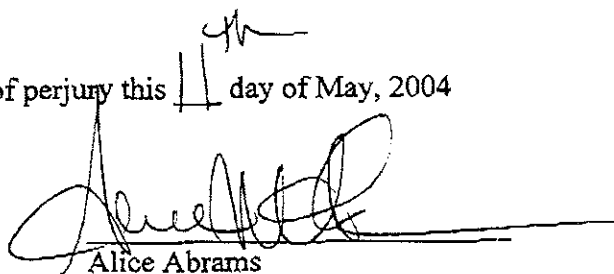
5. In the very few and isolated instances in which my husband and I have loaned money in the past, it has always been directly to or at the request of a family member or close personal friend. Neither myself nor my husband, Bob Abrams, regularly extend consumer credit personally or through Sanctuary.

6. Adam Visnick's brother, Jake, has been the best friend of my son, Eric, for well over ten years. However, I never had any conversations or communications with Adam Visnick with respect to the loan transaction from Sanctuary. In fact, I have not had any substantive conversations with Adam at all, other than the occasional exchange of social greetings. Likewise, I have never had any conversations with Howard Visnick with respect to a loan to his son, Adam.

7. I had no role at all in the arranging or giving of the loan to Adam Visnick from Sanctuary. To the contrary, when my husband mentioned that he was thinking about loaning money to Adam Visnick, I strongly discouraged it because I thought it was a bad idea to loan money to the brother of our son's best friend. I told my husband that that he "was out of [his] mind" to loan money to Adam Visnick.

8. I did not receive any fee or benefit in connection with the loan of money to Adam Visnick from Sanctuary.

Signed under the pains and penalties of perjury this 11 day of May, 2004


Alice Abrams